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10 UNITED STATES DISTRICT COURT
11 NORTHERN DISTRICT OF CALIFORNIA

12 IN RE: JUUL LABS, INC., MARKETING,
13 SALES PRACTICES, AND PRODUCTS
LIABILITY LITIGATION
14

Case No. 3:19-md-02913-WHO

**DECLARATION OF MICHAEL J.
GUZMAN IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
SEALED**

15 THIS DOCUMENT RELATES TO:

16 *Cole Aragona v. Juul Labs, Inc., et al.*,
Case No. 3:20-cv-1928;
17 *Jordan Dupree v. JUUL LABS, INC., et al.*,
Case No. 3:20-cv-03850;
18 *Kaitlyn Fay v. JUUL LABS, INC., et al.*,
Case No. 3:19-cv-07934;
19 *Jennifer Lane v. JUUL LABS, INC., et al.*,
Case No. 3:20-cv-04661;
20 *Bailey Legacki v. JUUL LABS, INC., et al.*,
Case No. 3:20-cv-01927;
21 *Walker McKnight v. JUUL LABS, INC., et al.*,
Case No. 3:20-cv-02600;
22 *Carson Sedgwick v. JUUL LABS, INC., et al.*,
Case No. 3:20-cv-03882;
23 *Ben Shapiro v. JUUL LABS, INC., et al.*,
Case No. 3:19-cv-07428; and
24 *Matthew Tortorici v. JUUL LABS, INC., et*
25 *al.*, Case No. 3:20-cv-03847
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1 I, MICHAEL J. GUZMAN, declare:

2 1. I am a partner at the law firm of Kellogg, Hansen, Todd, Figel & Frederick,
3 P.L.L.C., and counsel to Defendants Hoyoung Huh, Nicholas Pritzker, and Riaz Valani (the “Non-
4 Management Directors”). I am admitted to practice before this Court *pro hac vice*. I make this
5 declaration based on my own personal knowledge. If called upon to testify, I could and would
6 testify competently to the truth of the matters stated herein.

7 2. I submit this Declaration in accordance with Civil Local Rule 79-5 in support of the
8 Administrative Motion to Consider Whether Another Party’s Material Should Be Sealed.

9 3. In addition to this Declaration, attached to the Administrative Motion to Consider
10 Whether Another Party’s Material Should Be Sealed are the following:

- 11 a. A true and correct copy of Exhibit A: Plaintiff’s Second Supplemental and
12 Amended Responses to Defendant JUUL Lab Inc.’s First Set of
13 Interrogatories to Plaintiff Cole Aragona;
14 b. A true and correct copy of Exhibit B: Plaintiff’s Second Supplemental and
15 Amended Responses to Defendant JUUL Lab Inc.’s First Set of Requests
16 for Production of Documents to Plaintiff Cole Aragona; and
17 c. A true and correct copy of Exhibit C: Plaintiff Cole Aragona’s Amended
18 Plaintiff Fact Sheet.

19
20 I declare under penalty of perjury that the foregoing is true and correct. Executed this
21 22nd day of January, 2025, in Washington, D.C.

22 /s/ Michael J. Guzman
23 Michael J. Guzman
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